

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA]
] No. 3:11-CR-00151
v.] CHIEF JUDGE HAYNES
ERIC ALLEN]

**MOTION TO CONTINUE TRIAL DATE, PLEA CONSUMMATION DEADLINE,
AND MOTION FILING DEADLINE**

Comes now undersigned counsel and hereby respectfully moves this Honorable Court to continue the trial, plea consummation deadline and motion-filing deadline for approximately ninety (90) days. For cause, counsel would refer the Court to the contemporaneously filed sealed pleading outlining reasons for the delay.

Exhibit
This motion
is filed with
the undersigned
Judge based upon
the Defendant's
inability to proceed
to trial as scheduled
as follows:
2-18-14

Respectfully submitted,

s/ Patrick G. Frogge
PATRICK G. FROGGE, No. 20763
Bell, Tennent & Frogge
Bank of America Plaza
414 Union Street, Suite 904
Nashville, Tennessee 37219
(615) 244-1110 (telephone)
(615) 244-1114 (facsimile)

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing Motion was filed electronically to Assistant U.S. Braden Boucek, Suite A-961, 110 Ninth Avenue, South, Nashville, Tennessee 37203 on this the 14th day of February, 2014.

s/ Patrick G. Frogge
PATRICK G. FROGGE